

FILED

IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF VIRGINIA
RICHMOND DIVISION

2011 APR 11 P 1:16

CLERK US DISTRICT COURT
RICHMOND, VIRGINIA

TAWNY GROSSBERG,

Plaintiff,

v.

THE TRAVELERS INDEMNITY
COMPANY OF AMERICA,

Defendant.

Civil Action No.: 3:11cv223

THE TRAVELERS INDEMNITY COMPANY OF AMERICA'S
NOTICE OF REMOVAL

Defendant The Travelers Indemnity Company of America ("Travelers"), by counsel, hereby files this Notice of Removal pursuant to the provisions of 28 U.S.C. §§ 1332, 1441, and 1446, and states as follows for its Notice of Removal.

1. This civil action commenced in the Circuit Court for Chesterfield County, Virginia, on January 12, 2011, with the filing of a Complaint by plaintiff Tawny Grossberg, styled *Tawny Grossberg v. The Travelers Indemnity Company of America*, Case Number: CL11-96.

2. Attached hereto as Exhibit A and made a part hereof is a copy of all the process, orders, and pleadings filed and/or served in this action, including Plaintiff Grossberg's Complaint, and a Notice of Service of Process showing the dates of service for Travelers (the sole Defendant) in this action.

3. Travelers received a copy of the Complaint (and accompanying Summons) on March 23, 2011, when a copy of the Complaint (and Summons) was served on Travelers registered agent. This Notice of Removal is timely filed within - 30 days after Travelers was

(c) Defendant Travelers was and is, both at the time of the commencement of this action and at the time of the filing of this Notice of Removal, a corporation organized and existing under the laws of the State of Connecticut (incorporated in Connecticut) with its principal place of business in Connecticut – thus, a citizen of Connecticut; and

(d) at both the time of the commencement of this action and at the time of the filing of this Notice of Removal, no Defendant in this action was a citizen of the Commonwealth of Virginia; and

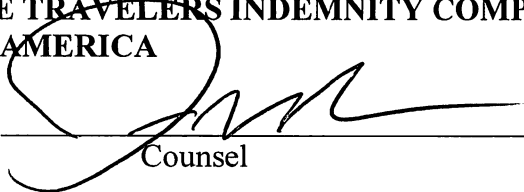
(e) Travelers has consented to and requests removal

8. Travelers will promptly give written notice of the filing of this Notice of Removal to Plaintiff Grossberg and will promptly file a copy of this Notice with the Clerk of the Chesterfield County Circuit Court.

9. A jury demand has been made by Plaintiff Grossberg in this action.

WHEREFORE, Travelers hereby requests that this action be removed from the Chesterfield County Circuit Court to the United States District Court for the Eastern District of Virginia, Richmond Division, pursuant to this Notice of Removal, and that the Court assume jurisdiction over this action.

**THE TRAVELERS INDEMNITY COMPANY
OF AMERICA**

By: 
Counsel

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CERTIFICATE OF SERVICE

I hereby certify that on the 11th day of April 2011, the foregoing was served by U.S. Mail upon the following:

P. Christopher Guedri
Allen, Allen, Allen and Allen
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Counsel for Plaintiff



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